

1 Martin Pitha (SBN 192447)
2 mpitha@lp-lawyers.com
3 Lillis Pitha LLP
4 2 Park Plaza, Suite 480
5 Irvine, California 92614
6 (949) 209-9020 (t)
7 (949) 759-1845 (f)

8 Douglas F. Stewart (*pro hac vice*)
9 doug.stewart@bracewell.com
10 Jared Schuettenhelm (SBN 267885)
11 jared.schuettenhelm@bracewell.com
12 Bracewell LLP
13 701 Fifth Avenue, Suite 6200
14 Seattle, Washington 98104-7018
15 (206) 204-6200 (t)
16 (800) 404-3970 (f)

17 David J. Ball (*pro hac vice*)
18 david.ball@bracewell.com
19 Bracewell LLP
20 1251 Avenue of the Americas
21 New York, New York 10020
22 (212) 508-6100 (t)
23 (800) 404-3970 (f)

24 *Attorneys for Defendant Nordstrom, Inc.*

25 **UNITED STATES DISTRICT COURT**
26 **CENTRAL DISTRICT OF CALIFORNIA**

27 WONGAB CORPORATION,
28
Plaintiff,

v.
NORDSTROM, INC., et al.

Defendants.

Case No. 2:17-cv-02974-AB-AGR

**DECLARATION OF JARED D.
SCHUETTENHELM IN SUPPORT
OF DEFENDANT NORDSTROM,
INC.'S MOTION TO DISMISS
PLAINTIFF'S FIRST AMENDED
COMPLAINT**

Date: September 22, 2017
Time: 10:00 a.m.
Place: Courtroom 7B
Judge: Hon. Andre Birotte Jr.
Courtroom: 7B

1 I, Jared D. Schuettenhelm, state as follows:

2 1. I am an attorney at Bracewell LLP and represent Defendant
3 Nordstrom, Inc. ("Nordstrom") in the above-captioned action. I offer this
4 declaration in support of Defendant Nordstrom, Inc.'s Motion to Dismiss Plaintiff's
5 First Amended Complaint.

6 2. Attached as Exhibit 1 is a true and correct copy of the Order
7 Granting Defendants' Motion To Dismiss Plaintiff's Second Amended Complaint,
8 issued by United States District Judge Manuel L. Real in *Malibu Textiles Inc. v.*
9 *Label Lane International, Inc.*, Case No. 2:14-cv-04054-R-MAN (C.D. Cal. June
10 29, 2017) (Dkt. 44).

11 3. Attached as Exhibit 2 is a true and correct copy of the Order
12 Granting Defendant's Motion To Dismiss Plaintiff's First Amended Complaint,
13 issued by United States District Judge Manuel L. Real in *Malibu Textiles Inc. v.*
14 *H&M Hennes & Mauritz LP, et al.*, Case No. 2:14-cv-01018-R-E (C.D. Cal. June
15 29, 2017) (Dkt. 58).

16
17 Executed on this 18th day of August 2017.

18
19 Respectfully submitted,

20
21 /s/ Jared D. Schuettenhelm
22 Jared Schuettenhelm (SBN 267885)
23 jared.schuettenhelm@bracewell.com
24 Bracewell LLP
25 701 Fifth Avenue, Suite 6200
26 Seattle, Washington 98104-7018
27 (206) 204-6200 (t)
28 (800) 404-3970 (f)

CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2017, I electronically filed the foregoing document with the Clerk of the Court for the United States District Court for the Central District of California by using the CM/ECF system, which constitutes service on all counsel of record to this action.

Dated: August 18, 2017

/s/ Douglas F. Stewart

Douglas F. Stewart